

**REMARKS/ARGUMENTS**

Prior to the entry of this Amendment, claims 1, 3-5, 7-18, 20-24, 26-31, and 33-42 were pending in this application. Claims 1, 4, 16, 18, 21, 22, 24, 27, 28, 31, 34, 35, 37, 38, 40, and 41 have been amended, no claims have been added, and no claims have been canceled herein. Therefore claims 1, 3-5, 7-18, 20-24, 26-31, and 33-42 remain pending in the application. Applicants respectfully request reconsideration of these claims for at least the reasons presented below.

**35 U.S.C. § 103 Rejection, Schneider in view of Miller**

Claims 1, 3-5, 7-18, 20-24, 26-31 and 33-42 were previously rejected under 35 U.S.C. § 103(a) as being unpatentable over U. S. Patent No. 6,408,336 of Schneider et al. (hereinafter "Schneider") in view of U. S. Patent No. 6,839,752 of Miller et al. (hereinafter "Miller"). The Applicants respectfully traverse the rejection and submit that the Office Action does not establish a *prima facie* case of obviousness in rejecting these claims. Therefore, the Applicants request reconsideration and withdrawal of the rejection.

In order to establish a *prima facie* case of obviousness, the Office Action must establish: 1) some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or combine their teachings; 2) a reasonable expectation of success of such a modification or combination; and 3) a teaching or suggestion in the cited prior art of each claimed limitation. See MPEP § 706.02(j). However, the references do not teach or suggest each claimed limitation. For example, neither reference, alone or in combination, teaches or suggests accessing an indication of a first policy from a plurality of policies, each policy of the plurality of policies defining a policy for subscribing to or unsubscribing from said first group.

As discussed previously, Schneider is directed to "control of access to data in a distributed environment" (col. 1, lines 32-33) and more specifically to making access filters more scalable by decentralizing administration of these filters (col. 5, line 66 - col. 6, line 1). More specifically, Schneider discloses three types of policies, an access policy, an administrative policy, and a policy maker policy. (Col. 10, lines 52-54) Schneider defines these policies as follows:

"Policy information is further divided into access policy 307, administrative policy 305, and policy maker policy 306.  
access policy 307 defines rights of access by user groups to information sets;  
administrative policy 305 defines rights of user groups to define/delete/ modify objects in VPN 201. Among the objects are access policies, information sets, user groups, locations in VPN 201, servers, and services; and  
policy maker policy 306 defines rights of user groups to make access policy for information sets." (Col. 10, lines 52-63)

That is, under Schneider, an access policy defines a user's or group's rights to access particular information while the administrative policy defines a user's ability to or rights to modify membership, i.e., defines who has administrative rights to add or remove members. However, Schneider does not teach or suggest a plurality of policies for subscribing to or unsubscribing from a group. Rather, Schneider teaches an administrative policy that defines which user are allowed to add or remove members from a group. The process of adding or removing user to a group under Schneider is then carried out by these designated administrators in a manner similar to that described in the background section of the pending application. In other words, Schneider's administrative policy defines who can act as an administrator, i.e., who can change group membership, but "the administrators who have control over a user group are responsible for correctly defining membership in the user group." (Col. 16, lines 8-11, see also Background of the pending application, page 2, lines 20-28)

Miller is "directed to clustered computer systems, and in particular, to the sharing of group data during membership changes in such systems." (Col. 1, lines 8-10) Miller

"utilize[s] subgroup-specific leader members to exchange group data between group members during the handling of a request to organize members into a group in a clustered computer system." (Col. 3, lines 12-15) Under Miller "the subgroups with which group members are associated for the purposes of determining subgroup leaders are typically defined based upon known coherency between local group data stored in various members of a group." (Col. 3, lines 29-32) That is, under Miller, group membership is determined based on each member having stored thereon a set of data that is coherent with that of other members of the group. However, Miller does not teach or suggest accessing an indication of a first policy from a plurality of policies, each policy of the plurality of policies defining a policy for subscribing to or unsubscribing from said first group.

The combination of Schneider and Miller is no more relevant to the pending claims than either reference alone since neither reference, alone or in combination, teaches or suggests accessing an indication of a first policy from a plurality of policies, each policy of the plurality of policies defining a policy for subscribing to or unsubscribing from said first group. Rather, Schneider teaches an administrative policy that defines which user are allowed to add or remove members from a group while Miller teaches determining group membership based on each member having stored thereon a set of data that is coherent with that of other members of the group.

Claim 1, upon which claims 3-5 and 7-17 depend, claim 24, upon which claims 26-30 depend, and claim 37, upon which claims 38-39 depend, each recite in part "receiving from a first entity a request to add the first entity to a first group; accessing an indication of a first policy from a plurality of policies, each policy of the plurality of policies defining a policy for subscribing to or unsubscribing from said first group; and adding said first entity to said first group as a static member based on said first policy." Neither Schneider nor Miller teaches or suggests, alone or in combination, accessing an indication of a first policy from a plurality of policies, each policy of the plurality of policies defining a policy for subscribing to or

unsubscribing from said first group. Rather Schneider teaches an administrative policy that defines which user are allowed to add or remove members from a group while Miller teaches determining group membership based on each member having stored thereon a set of data that is coherent with that of other members of the group. For at least these reasons, claims 1, 3-5, 7-17, 24, 26-30, and 37-39 should be allowed.

Claim 18, upon which claims 20-23 depend, claim 31, upon which claims 33-36 depend, and claim 40, upon which claims 41-42 depend, each recite in part "receiving from a first static member a request to remove the first static member from a first group; accessing an indication of a first policy from a plurality of policies, each policy of the plurality of policies defining a policy for subscribing to or unsubscribing from said first group; and removing said first static member from said first group based on said first policy." Neither Schneider nor Miller teaches or suggests, alone or in combination, accessing an indication of a first policy from a plurality of policies, each policy of the plurality of policies defining a policy for subscribing to or unsubscribing from said first group. Rather Schneider teaches an administrative policy that defines which user are allowed to add or remove members from a group while Miller teaches determining group membership based on each member having stored thereon a set of data that is coherent with that of other members of the group. For at least these reasons, claims 18, 20-23, 31, 33-36, and 40-42 should be allowed.

### CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

Appl. No. 09/998,898

PATENT

Amdt. dated: February 5, 2007

Amendment under 37 CFR 1.114 Request for Continued  
Examination

If the Examiner believes a telephone conference would expedite prosecution of  
this application, please telephone the undersigned at 303-571-4000.

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Respectfully submitted,



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